



OTCA

Office of Technical &
Customer Assistance

Fact Sheet

Pollution Prevention Program

Rhode Island Exterior Lead Paint Removal Certification Program

The Rhode Island Exterior Lead Paint Removal Certification Program is in the final planning and design stage, with implementation expected in early 2005. As with Rhode Island's Auto Body Certification Program, it is being designed as a simpler and more useful way to regulate, in a less threatening manner, segments of the painting contractor and remodeler/renovation industries that engage in the removal of exterior lead paint. It is designed to improve compliance with environmental regulations.

With funding provided from EPA New England in 2000, and reprogrammed to this project in 2003, it will be a broad certification program based on compliance with DEM Air Pollution Control Regulation # 24, entitled, "Removal of Exterior Lead Based Paint from Exterior Surfaces", as well as compliance with the federal Pre-Renovation Education Rule described below. It will also cover lead paint contaminated debris cleanup and disposal guidelines. It is important to note that all parties removing exterior lead paint, including homeowners performing the work themselves, must comply with Regulation # 24.

It should also be noted that federal law, per 40 CFR Part 745, Lead, requires that contractors, property managers, and others who perform renovations for compensation (including paint removal of more than 2 sq. ft.) on residential houses and apartments built before 1978 provide lead information to residents. Renovators/painters must provide a pamphlet titled "***Protect Your Family from Lead in Your Home***" before starting work, and obtain a signature acknowledging receipt of the pamphlet. It can be downloaded for viewing and printing from the U. S. Environmental Protection Agency (EPA) website at <http://www.epa.gov/lead/leadpdf.pdf>, or in other languages from EPA's website at <http://www.epa.gov/lead/leadprot.htm>. Additional helpful information on this topic can be found in the EPA publication, "Reducing Lead Hazards When Remodeling Your Home", found at <http://www.epa.gov/lead/rpamph.pdf>.

This program is a partnership between the Rhode Island Departments of Environmental Management (DEM) and Health (DOH), the U.S. Environmental Protection Agency, Rhode Island Housing Resources Commission, and the University of Rhode Island Center for Pollution Prevention & Environmental Health. The program will leverage scarce staff resources, and reach a substantially higher percentage of the regulated sector than routine enforcement inspections. Participation in the program is voluntary, with benefits including compliance assistance information that will be provided to program participants. The concept is patterned after the very successful Environmental Results Program initiated by the Massachusetts Department of Environmental Protection, and the Rhode Island Auto Body Environmental/Occupational Health Compliance Self-Certification Program. The program starts with serious consideration to these important facts about lead:

- ◆ Lead paint dust is **DANGEROUS!**
- ◆ Lead poisoning is a serious environmental health hazard.
- ◆ Most houses in Rhode Island built before 1978 contain lead based paint.
- ◆ Renovating lead-painted surfaces creates hazardous dust, fumes, and debris if removed improperly.
- ◆ Lead poisoning can arise from exposure to lead-based paint chips, as well as dust produced, during preparation work for repainting.
- ◆ According to the Rhode Island Department of Health: Lead, even at low levels, can cause children to have learning disabilities, lower IQ, and behavioral problems.
- ◆ Lead can also cause: High blood pressure, Anemia, Brain damage, Impotence, and Death.

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Materials are being developed for this program, in concert with the Rhode Island Exterior Lead Paint Removal Certification Program Steering Committee, that include:

- An informational brochure
- A Certification Workbook
- A Certification Participation Form & Checklist
- A Project Checklist to be provided by the contractor to the homeowner or occupant prior to starting the paint removal project.

Benefits of participation in the program include:

- Free consultation from DEM's Office of Technical & Customer Assistance staff with assistance in complying with applicable environmental requirements.
- Being placed on a list of certified paint contractors on DEM's website.
- Use as a marketing tool with customers
- A Certificate of Participation from DEM
- Provided with educational and promotional materials

The program will also provide referral information and assistance for appropriate training opportunities, as they become available.

For more information, please contact Tom Armstrong at 401-222-4700, Ext. 4412, or Thomas.Armstrong@dem.ri.gov

A Toxic Nightmare: Why Regulation is Needed

A report published by the National Institutes of Health (2003) described a case of lead poisoning and environmental contamination that resulted from the improper removal of exterior lead-based paint from a home located in a middle-income neighborhood. The uncontrolled removal of lead paint from approximately 3,000 ft² of exterior siding resulted in interior lead dust levels ranging from 390 to 27,600 ug Pb/ft², yard soil lead levels of 360 to 130,000 ppm, lead poisoning (requiring immediate hospitalization) of three children aged 1, 2, and 4, and the death of a 5-year old family pet (dog) that died with a blood lead level of 177 ug/dL. The "hard" costs associated with property decontamination were over \$195,000 (Jacobs, D.E., Mielke, H., and N. Pavur. 2003. The High Cost of Improper Removal of Lead-Based Paint from Housing: A Case Report. *Environmental Health Perspectives*. 111:185-186).

Similarly, Rhode Islanders are at risk when exterior lead-based paint is improperly removed. The careless removal and handling of lead paint from exterior surfaces has resulted in enforcement actions taken against individuals and contractors by Rhode Island Department of Environmental Management, and at least two documented cases of groundwater contamination. In order to protect human health and the environment, DEM enforcement staff continues to inspect sites where painting projects occur.



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